other hand, in the Northern District of Illinois, Judge Grady has three pending MDLs and Judge Coar has one pending MDL. Relevant pages of the 2005 Statistical Analysis of Multidistrict Litigation are attached as Exhibit "A." As such, there is no basis to transfer the actions to the Northern District of Illinois.

IV. CONCLUSION.

For the foregoing reasons, Plaintiff Michele Snow respectfully submits that the actions identified on Exhibit "A" of Defendants' motion to transfer should be centralized in the Southern District of New York. The Southern District of New York, in addition to being where Random House bases its operations and where the author James Frey resides, is where the witnesses and documents relevant to this litigation will likely be found. Finally, the Southern District of New York is easily accessible, with two large international airports located less than an hour's drive, rail access along the Northeast Corridor, and easy access via interstate roadways.

Accordingly, Plaintiff respectfully requests that this Panel enter an Order transferring the related actions to the Southern District of New York.

Dated: March 17, 2006

BRODSKY & SMITH, LLC

By: ______________________
Evan J. Smith, Esquire (ES3254)
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516-741-4977
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Attorneys for Plaintiff

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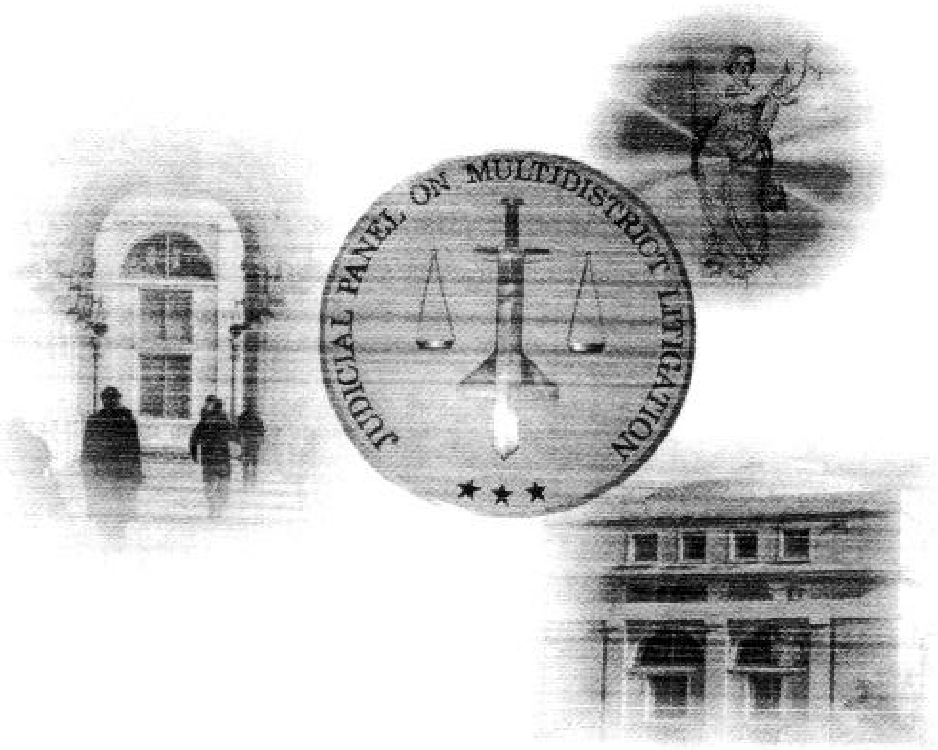
EXHIBIT "A"

Judicial Panel on Multidistrict Litigation


JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

Statistical Analysis of Multidistrict Litigation 2005

Cumulative from September 1968 through September 30, 2005

Statistical Analysis of Multidistrict Litigation

Cumulative From September 1968 Through September 30, 2005

Cumulative Summary of Multidistrict Litigation

Summary by Circuit of Multidistrict Litigation
Under 28 U.S.C. § 1407

Summary of Multidistrict Litigation by Circuit
and District Under 28 U.S.C. § 1407

Index to Transferee Districts with Multidistrict Litigation
Pending as of September 30, 2005, or Closed Since October 1, 2004

Summary by Docket of Multidistrict Litigation Pending
as of September 30, 2005, or Closed Since October 1, 2004

Summary of Litigations Docketed but Not Transferred Under
28 U.S.C. § 1407 for the Period October 1, 2004, to September 30, 2005

Prepared by: The Office of the Clerk
Judicial Panel on Multidistrict Litigation
October 2005

SUMMARY BY DOCKET OF MULTIDISTRICT LITIGATION PENDING AS OF SEPTEMBER 30, 2005, OR CLOSED SINCE OCTOBER 1, 2004

SUMMARY BY DOCKET OF MULTIDISTRICT LITIGATION PENDING AS OF SEPTEMBER 30, 2005, OR CLOSED SINCE OCTOBER 1, 2004

SECOND CIRCUIT
(continued)

Index to Tr'e Dist.	MDL No.	MDL Caption	Transferee Judge	Transferor Districts and Number of Cases Transferred	Total Tr'd	Total Filed in Tr'e Court	Cases Terminated Dis'd	Cases Terminated Rem'd	Cases Pending
208		**NEWORK, SOUTHRN**	*37 Litigations*						
	1153	Bennett Funding Group SEC (No. II)	Sprizzo, J.E.	3-CAS; 2-FLS; 20-NJ; 1-NYE; 1-NYN; 6-NYW; 1-TXS	34	32	37	0	29
	1230	Philip Services Corp. SEC	Mukasey, M.B.	2-NJ; 6-PAW; 1-TNE; 1-TNM	10	14	23	0	1
	1291	Omeprazole PAT	Jones, B.S.	2-DE; 3-FLS; 1-ILN; 3-NJ; 1-NYE; 2-WIE	12	8	5	6	9
	1336	Abercrombie & Fitch Co. SEC	Griesa, T.P.	15-OHS	15	5	0	0	20
	1348	Rezulin PL	Kaplan, L.A.	3-AK; 10-ALM; 14-ALN; 5-ALS; 12-ARE; 5-ARW; 5-AZ; 357-CAC; 282-CAE; 96-CAN; 45-CAS; 4-CO; 3-CT; 3-DC; 1-DE; 31-FLM; 5-FLN; 6-FLS; 15-GAN; 2-HI; 1-IAN; 3-IAS; 2-ID; 6-ILC; 5-ILN; 7-ILS; 7-INS; 4-KS; 11-KYE; 2-KYW; 56-LAE; 6-LAM; 28-LAW; 11-MA; 8-MD; 4-ME; 8-MIE; 90-MN; 5-MOE; 5-MOW; 52-MSN; 103-MSS; 1-MT; 9-NCE; 7-NCM; 4-NCW; 4-NE; 5-NH; 11-NJ; 20-NM; 36-NV; 2-NYE; 1-NYN; 19-OHN; 26-OHS; 3-OKE; 2-OKN; 3-OKW; 3-OR; 13-PAE; 5-PAM; 12-PAW; 38-PR; 2-RI; 13-SC; 6-TNE; 3-TNM; 12-TNW; 18-TXE; 43-TXN; 75-TXS; 23-TXW; 3-UT; 12-VAE; 58-VAW; 2-VT; 1-WAE; 4-WAW; 2-WIE; 1-WIW; 3-WVN; 13-WVS	1846	13	600	0	1259
	1358	Methyl Tertiary Butyl Ether ("MTBE") PL	Scheindlin, S.A.	2-CAC; 3-CAE; 5-CAN; 1-CAS; 8-CT; 1-FLM; 2-FLN; 1-FLS; 1-IAN; 1-IAS; 1-ILC; 2-ILN; 2-ILS; 3-INN; 3-INS; 5-KS; 2-LAW; 3-MA; 1-MD; 4-NH; 2-NJ; 10-NYE; 1-PAE; 1-VAE; 3-VAW; 3-VT; 1-WVS	72	14	8	0	78
	1368	High Pressure Laminate AT	Brieant, C.L.	1-ILN; 1-MIE; 1-TXE; 4-TXW	7	30	25	0	12

SUMMARY BY DOCKET OF MULTIDISTRICT LITIGATION PENDING AS OF SEPTEMBER 30, 2005, OR CLOSED SINCE OCTOBER 1, 2004

SECOND CIRCUIT (continued)

Index to Tr'e Dist.	MDL No.	MDL Caption	Transferee Judge	Transferor Districts and Number of Cases Transferred	Total Tr'd	Total Filed in Tr'e Court	Cases Terminated Dis'd	Cases Terminated Rem'd	Cases Pending
	1374	Assicurazioni Generali S.p.A. Holocaust Era Insurance	Mukasey, M.B.	29-CAC; 1-CAN; 1-CAS; 1-FLS; 1-WIE	33	3	36	0	0
	1379	Literary Works in Electronic Databases CR	Daniels, G.B.	1-DC; 1-DE	2	3	0	0	5
	1409	Currency Conversion Fee AT	Pauley, III, W.H.	6-CAN; 1-FLS; 5-ILN; 2-NYE; 8-PAE; 1-TXS	23	9	29	0	3
	1413	Buspirone AT	Koeltl, J.G.	2-CAC; 5-CAN; 1-CAS; 11-DC; 1-FLS; 1-ME; 2-MIE; 3-NJ; 1-TXE; 1-WIE; 1-WVS	29	5	34	0	0
	1428	Ski Train Fire in Kaprun, Austria - 11/11/00	Scheindlin, S.A.	1-CAC; 2-CO; 2-CT; 1-FLM; 3-MA; 1-MIE; 1-PAE; 1-TXE	12	13	13	0	12
	1443	America Online, Inc., Community Leaders	Duffy, K.T.	1-NJ; 1-OHS	2	1	0	0	3
	1448	Belle Harbor, NY - 11/12/01 AD	Sweet, R.W. Keenan, J.F.	3-CAC; 2-CAN; 16-FLS; 1-MA; 1-NJ; 104-NYE; 4-PR; 1-RI; 68-TXN; 18-TXS	218	147	20	1	344
	1472	Global Crossing, Ltd. SEC & "ERISA"	Lynch, G.E.	49-CAC; 1-CAN; 1-DC; 2-MSS; 2-NJ; 10-NYW	65	24	81	0	8
	1484	Merrill Lynch & Co., Inc., Research Reports SEC	Keenan, J.F.	3-AZ; 2-CAC; 2-CAN; 1-CAS; 3-FLM; 2-FLS; 1-ILC; 1-ILN; 1-KYW; 1-MD; 3-MIE; 2-MN; 1-MOE; 3-MSS; 3-NJ; 1-OKN; 2-OKW; 1-OR; 1-PAM; 1-TNW; 3-TXN; 1-TXW; 1-WAW; 1-WVN	41	135	65	0	111
	1487	Worldcom, Inc., SEC & "ERISA"	Cote, D.	5-AK; 10-CAC; 3-CAN; 1-CO; 7-DC; 5-FLS; 1-GAM; 2-GAN; 2-ID; 4-ILN; 2-MD; 1-MIE; 1-MIE; 2-MN; 1-MOE; 15-MSN; 44-MSS; 2-MT; 1-NCE; 1-NCM; 1-NJ; 1-NM; 2-OHN; 1-OHS; 1-OKE; 1-OKN; 2-OKW; 1-TNE; 2-TNM; 1-TXE; 3-TXN; 1-TXS; 4-WAW; 1-WIE; 1-WIW; 1-WVS	134	24	50	0	108
	1495	Enterprise Mortgage Acceptance Co. SEC	Kram, S.W.	1-CT; 1-TXN; 2-WIE	4	9	2	0	11
	1499	South African Apartheid	Sprizzo, J.E.	1-CAN; 1-FLM; 1-MIE; 2-NJ; 4-NYE; 1-SC; 1-TXS	11	3	1	0	13
	1500	AOL Time Warner Inc. SEC	Kram, S.W.	1-FLS; 1-TXE; 5-VAE	7	28	1	0	34
	1508	Medco Health Solutions, Inc. Pharmacy Benefits Management	Bricant, C.L.	8-CAN; 1-CAS; 2-MOE	11	7	12	0	6